

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:)	Chapter 7
)	Bankruptcy No. 14-13193
TREND SOUND PROMOTER AMG CORP.,)	
)	
Debtor(s).)	
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BANKRUPTCY ESTATE OF TREND)	Adversary No. 14-01248
SOUND PROMOTER AMG CORP.,)	
by and through Nancy James, Bankruptcy)	
Trustee,)	
)	
Plaintiff,)	
)	
v.)	
)	
VOLODIMYR PIGIDA and JANE DOE)	
PIGIDA, husband and wife, and the marital)	
community comprised thereof, individually)	
and as trustee of the Lakeshore Enterprises)	DECLARATION OF JAMES RIGBY
Trust; and MARINA BONDARENKO and)	IN SUPPORT OF PLAINTIFF'S
JOHN DOE BONDARENKO, wife and)	MOTION FOR PARTIAL SUMMARY
husband, and the marital community)	JUDGMENT
comprised thereof, individually and as trustee)	
of the Lakeshore Enterprises Trust, and)	
SOUNDT STUDIOS LLC, a Washington)	
limited liability company,)	
)	
Defendants.)	
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The undersigned makes the following statement under penalty of perjury:

1. I am over 18 years of age, am competent to testify to the statements herein and make the statements herein based on facts personally known to me.

**DECLARATION OF JAMES RIGBY
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**
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THE RIGBY LAW FIRM
600 Stewart Street, Suite 1908
Seattle, WA 98101
(206) 755-7600

2. Attached hereto as exhibits and incorporated herein by this reference are true and accurate copies of the following documents which are admissible in evidence:

- a. Amended Complaint to Recover Fraudulent Conveyance, or in the Alternative to Recover a Preference, and to Add Party, pp 3-8;
- b. Answer and Affirmative Defenses to Plaintiff's First Amended Complaint, pp 9-15;
- c. Lakeshore Interrogatories and Answers (Bondarenko as Trustee), pp 16-29;
- d. Lakeshore Interrogatories and Answers (Bondarenko Individually), pp 30-43;
- e. Lakeshore Interrogatories and Answers (Pigida as Trustee), pp 44-53;
- f. Lakeshore Interrogatories and Answers (Pigida Individually), pp 54-65;
- g. Lakeshore Second Interrogatory Answers (Pigida Individually), pp 66-77;
- h. Lakeshore Second Interrogatory Answers (Lakeshore), pp 78-89;
- i. Lakeshore Interrogatory Answers (Bondarenko as Trustee), pp 90-101;
- j. Lakeshore Second Interrogatory Answers (Bondarenko Individually), pp 102-113;
- k. Lakeshore Second Interrogatory Answers (Pigida as Trustee), pp 114-125;
- l. License Agreement dated December 5, 2012, between Soundtrack Studio LLC and the debtor, pp 126-130;
- m. State of Washington, Secretary of State, SoundT Studios LLC agents, pp 131-132; and
- n. SoundT Studios LLC assignments and invoices, pp 133-196.

DATED this 29th day of April, 2015.

/s/ James Rigby

James Rigby

**DECLARATION OF JAMES RIGBY
IN SUPPORT OF PLAINTIFF'S MOTION
FOR PARTIAL SUMMARY JUDGMENT**
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